

UNITED STATES DISTRICT COURT

for the

Eastern District of Michigan

United States of America

v.

WILLIAM JAMES CHANNING BROWN

Case No.

Case: 2:22-mj-30325

Assigned To : Unassigned

Assign. Date : 8/1/2022

Description: CMP USA v.

CHANNING BROWN (SO)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of July 28, 2022 in the county of Wayne in the
Eastern District of Michigan, the defendant(s) violated:

*Code Section**Offense Description*

18 U.S.C. § 2119

Taking a motor vehicle transported, shipped, or received in interstate commerce from the person or presence of another by force and violence or by intimidation and with intent to cause death or serious bodily harm.

18 U.S.C. § 924(c)(1)(A)

Use of a firearm in relation to a crime of violence (carjacking).

This criminal complaint is based on these facts:

See attached affidavit.

☒ Continued on the attached sheet.

Sworn to before me and signed in my presence
 and/or by reliable electronic means.

Date: August 1, 2022City and state: Detroit, MI


 Complainant's signature

Christopher S. Pennisi, Special Agent, FBI
 Printed name and title


 Judge's signature

Hon. Jonathan J.C. Grey, United States Magistrate Judge
 Printed name and title

AFFIDAVIT

I, Christopher S. Pennisi, being duly sworn, depose and state as follows:

I. INTRODUCTION

1. I am employed as a Special Agent of the Federal Bureau of Investigation for seventeen years, and currently assigned to the Violent Crime Squad in the Detroit Division of the FBI.

2. I am an “investigative or law enforcement officer” of the United States within the meaning of 18 U.S.C. § 2501(7), that is, an officer of the United States who is empowered by the law to conduct investigations of and to make arrests for the offenses enumerated in 18 U.S.C. § 2516.

3. I have investigated federal violations concerning crimes of violence and firearms. I have gained experience through training and everyday work related to these types of investigations.

4. The statements contained in this Affidavit are based on my experience and background as a special agent and on information provided by police officers, other agents of the FBI, and other law enforcement personnel. The information outlined below is provided for the limited purpose of establishing probable cause and does not contain all of facts known to law enforcement related to this investigation.

5. This affidavit is made in support of a criminal complaint charging WILLIAM JAMES CHANNING BROWN with taking a motor vehicle transported, shipped, or received in interstate commerce from the person or presence of another by force and violence or by intimidation and with intent to cause death or serious bodily harm in violation of 18 U.S.C. § 2119.

6. This affidavit is also made in support of a criminal complaint charging BROWN with use of a firearm in relation to a crime of violence (carjacking) in violation of 18 U.S.C. § 924(c)(1)(A).

II. SUMMARY OF THE INVESTIGATION

7. On July 28, 2022, at approximately 2:40 a.m., victim MJ drove his silver 2012 Ford Mustang to a gas station located at 14481 Livernois Avenue in the City of Detroit.

8. While he was filling his tank with gas, MJ noticed a Chevrolet Traverse park on the opposite side of the gas pump MJ was using.

9. A male, later identified as WILLIAM JAMES CHANNING BROWN, exited the Traverse, pointed a black pistol at MJ and said “run them pockets,” which is a colloquial declaration that a robbery is taking place.

10. MJ described the person who held him at gunpoint as a black male wearing all black clothing with what looked to be a white bandana hanging out of his right rear pants pocket.

11. The gas station where BROWN carjacked MJ's vehicle had video surveillance of the area of the pumps. Review of the recording supported MJ's description of how the carjacking occurred including the fact that BROWN pointed a gun at MJ. A still image depicts BROWN holding MJ at gunpoint as follows:



12. While pointing the pistol at MJ (*circled in red*), BROWN reached into MJ's pockets and took his cash and spare car keys. He also demanded MJ's shoes, which MJ surrendered. BROWN took MJ's shoes and threw them into MJ's vehicle.

13. BROWN then commanded MJ to walk off. When MJ began walking towards the gas station's convenience store, BROWN told him not to go in there and continued pointing the gun at MJ until he left the area. BROWN then finished pumping gas into MJ's car.

14. Moreover, the video surveillance recordings showed that, at the time BROWN carjacked MJ, he was wearing all black clothing with a white tag sticking out of the right rear pocket of his pants. Still images were made from the video surveillance of BROWN and his white tag (*circled in blue*) as follows:



15. On July 28, 2022 at approximately 4:07 a.m., victim DR was at the gas station located at 3347 Mack Avenue in the City of Detroit.

16. BROWN arrived at a gas station in MJ's carjacked Ford Mustang while DR was pumping gas into his 2012 Dodge Charger.

17. The Mustang's passenger exited, approached DR, pointed a gun at DR, got into DR's vehicle and drove off. The gas station located at 3347 Mack Avenue had video surveillance at the time DR's vehicle was carjacked. Still images from the video depict DR being confronted by the gunman as follows:



18. The gun can be clearly seen in the video when the gunman enters DR's car (*circled in red*):

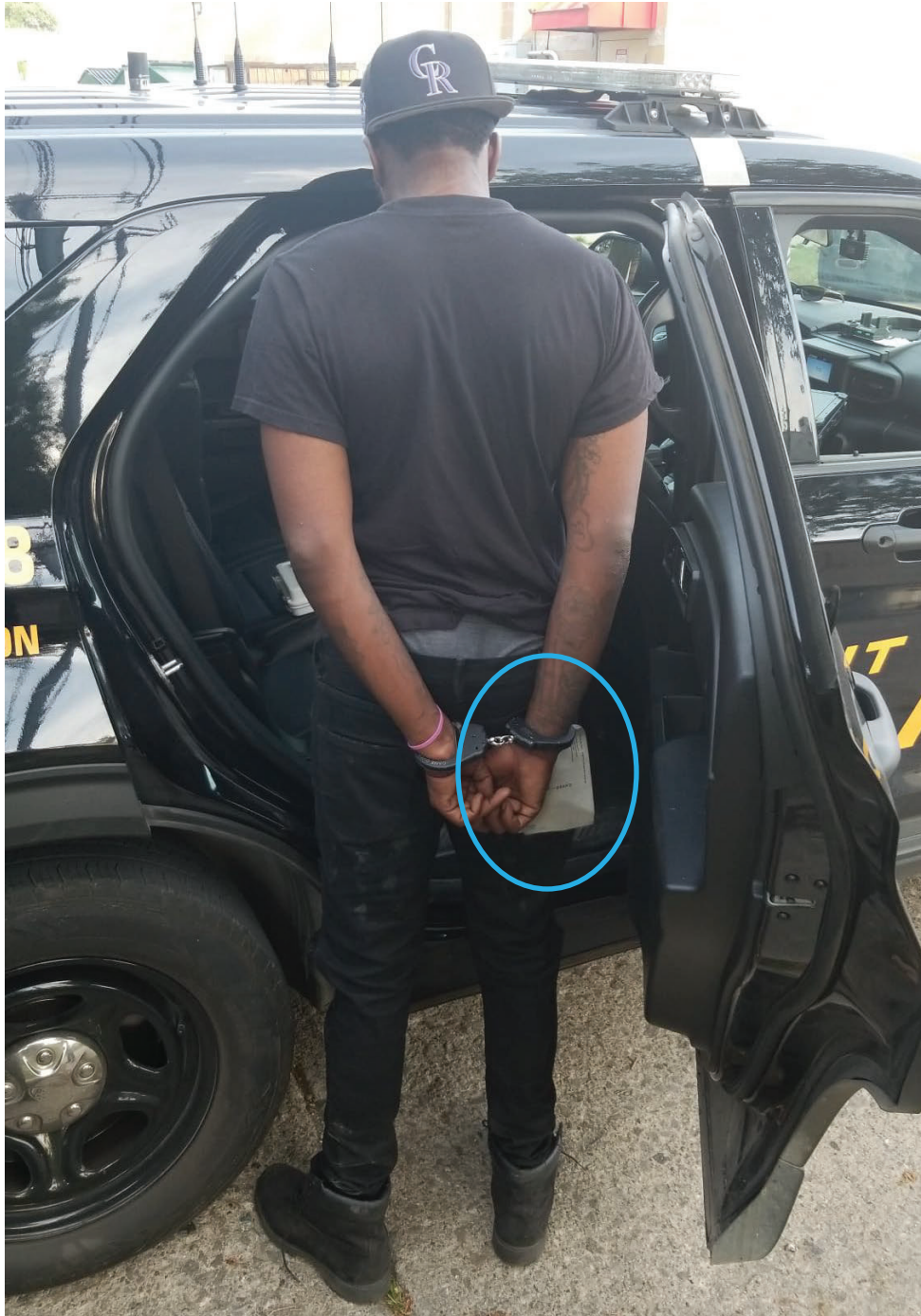


19. On July 28, 2022 at approximately 4:00 p.m., MJ's Mustang was located by Detroit Police officers being driven by a black male later identified as BROWN.

20. The Ford Mustang was placed under surveillance until BROWN exited the driver's seat of the Mustang. BROWN was taken into custody by Detroit Police. The key to the carjacked Mustang was found in BROWN'S pants pocket.

21. At the time BROWN was arrested, he was a black male wearing all black clothing with a large white tag hanging out of the right rear pocket of his

pants. A picture of him immediately following his arrest depicts BROWN as follows:



William Brown wearing black pants with a white tag on the back (*circled in blue*).

22. BROWN was interviewed on July 29, 2022 after receiving and waiving Miranda. BROWN was still wearing the pants with the large white tag. BROWN explained the tag is attached to his pants, and that he usually has the tag sticking out of his pants pocket when he wears them.

23. After seeing the video surveillance from the gas station located at 14481 Livernois Avenue, BROWN admitted that the video depicted him taking MJ's Mustang at gunpoint on July 28, 2022.

24. BROWN also admitted to possession of a handgun at the time he took MJ's Mustang on July 28, 2022. According to BROWN, he did not have the gun at the time of his arrest because it was not his and someone else took it after he completed the carjacking.

25. BROWN further admitted to driving the Mustang to the gas station where the Dodge Charger was carjacked at gunpoint.

26. Finally, BROWN admitted to knowing ahead of time that the CHARGER was going to be taken at gunpoint.

27. Review of the VIN number assigned to MJ's Ford Mustang indicated that it was made in Michigan. However, MJ purchased the car in Georgia in 2022 and drove it to Michigan from Georgia. Therefore, the vehicle was "transported in interstate commerce" as recited in 18 U.S.C. § 2119.

28. Review of the VIN number assigned to DR's Dodge Charger indicated that it was made in the country of Canada. Therefore, the vehicle was "transported in interstate commerce" as recited in 18 U.S.C. § 2119.

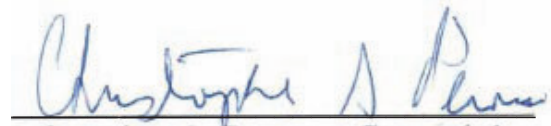
III. CONCLUSION

29. Based on the above information, probable cause exists that BROWN, while aided and abetted by others, took a motor vehicle transported, shipped, or received in interstate commerce from the person or presence of another by force and violence or by intimidation and with intent to cause death or serious bodily harm in violation of 18 U.S.C. § 2119 and brandished a firearm in relation to a crime of violence (carjacking) in violation of 18 U.S.C. § 924(c).

30. In consideration of the foregoing, I respectfully request that this Court issue a complaint against BROWN for violation of 18 U.S.C. §§ 2119 and 924(c)(1)(A).

31. Further in consideration of the foregoing, I respectfully request that this Court issue arrest warrants for BROWN for violation of 18 U.S.C. §§ 2119 and 924(c)(1)(A).

Respectfully submitted,

A handwritten signature in blue ink, appearing to read "Christopher S. Pennisi", is written over a horizontal line.

CHRISTOPHER S. PENNISI
Special Agent, FBI

Sworn to before me and signed in my
presence and/or by reliable electronic means.

A handwritten signature in black ink, appearing to read "Jonathan J.C. Grey", is written over a horizontal line.

HONORABLE JONATHAN J.C. GREY
UNITED STATES MAGISTRATE JUDGE

Date: August 1, 2022